EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

CONSORZIO DEL PROSCIUTTO DI SAN DANIELE,

Plaintiff

v.

DANIELE, INC.,

Defendant.

C.A. No. 07-039ML

**PLAINTIFF'S FIRST SET OF INTERROGATORIES PROPOUNDED TO DEFENDANT**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Plaintiff Consorzio del Prosciutto di San Daniele requests that Defendant answer under oath the following interrogatories within thirty (30) days from the date of service hereof.

INSTRUCTIONS AND DEFINITIONS

1. The term "document" is intended to be comprehensive and to include, without limitation, all original writings of any nature whatsoever, copies and drafts which, by reason of notes, changes, initials, or identification marks are not identical to the original, and all non-identical original copies thereof. In all cases, where an original is not available, "document" also means identical copies.

2. The term "document" includes, but is not limited to, correspondence, memoranda, contracts, leases, agreements, invoices, credit memoranda, credit files, records, data-sheets, purchase orders, tabulations, reports, bills of lading, evaluations, work papers, summaries, opinions, journals, statistical records, sales reports, financial reports, checks, notes, transcriptions, telegrams, teletypes, telex messages, recording of

telephone calls and other communications (including, but not limited to, notes, notations, memoranda and other writings of, or related to, telephone conversations or conferences), minutes and notes of transcriptions of all meetings and other communications of any type, microfilms, tapes or other records, logs, and any other information which is stored or carried electronically, by means of computer equipment or otherwise, and which can be retrieved in printed or graphic form.

3. The term "relating to" includes referring to, embodying, in connection with, commenting on, responding to, sharing, describing, concerning, analyzing, reflecting, or constituting.

4. Terms in the plural include the singular and terms in the singular include the plural.

5. The term "Plaintiff" refers to the Consorzio del Prosciutto di San Daniele. The term "Defendant" refers to Daniele International, Inc.

6. The term "person" includes a natural person, firm, association, partnership, corporation, or any other form of legal entity unless the context indicates otherwise.

7. Any interrogatory, the answer to which calls for a reference to the act of any person, shall be deemed to additionally call for a statement of the identity of any agent, employee, or any other representative of such person who acted or purported to act or whom you contend acted for such person in the matter referred to.

8. A request to "identify" or for the "identity" of a person constitutes a request for the name, present address and capacity and position of such person relative to Defendant.

9. A request to "identify" a document constitutes a request for the nature, title, substance of contents, date and place of its preparation and, if a communication, the date and place it was sent, date and place it was received, identity of the sender, identity of the

receiver, identity of any person for whom the sender or receiver acted or purported to act, and the identity of each person receiving a copy of said communication.

10. If any interrogatory calls for information not known to you, such interrogatory shall be deemed a request for your best estimate, understanding and belief as to the matter inquired about and a statement that you are presenting matters which are not known to you but are your best estimate, understanding or belief and a statement in full detail of all of the particulars as to how you acquired or arrived at such estimate, understanding and belief.

11. Unless otherwise stated, the term "San Daniele" refers to San Daniele, Italy.

## INTERROGATORIES

**INTERROGATORY NO. 1**

Identify each person who answered or contributed to the answer to each interrogatory.

**INTERROGATORY NO. 2**

Identify all persons whom Defendant believes to have personal knowledge of facts material to this case and for each such person, please describe fully the specific facts within the person's knowledge.

**INTERROGATORY NO. 3**

Identify all officers and directors of Defendant.

**INTERROGATORY NO. 4**

Identify the person who decided on behalf of Defendant, and all persons who assisted or participated in Defendant's decision, to adopt as a trademark each of the following: GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA.

**INTERROGATORY NO. 5**

Identify all persons who have advised Defendant on the use or registration of any trademark or other designation on prosciutto or other meat products since January 1, 2003 and, for each such person, describe the advice provided and identify all documents in which the advice is contained, described or discussed.

**INTERROGATORY NO. 6**

Identify all facts and documents that you contend show that any of the following is a trademark or would be recognized by purchasers as a trademark: GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA.

**INTERROGATORY NO. 7**

Identify all facts and documents that you contend support your interpretation of paragraph 5 of the Settlement Agreement of March 2005.

**INTERROGATORY NO. 8**

Identify all documents concerning the use or proposed use of any of the following as designations for prosciutto produced by Defendant, whether or not as trademarks: GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA.

**INTERROGATORY NO. 9**

Identify any and all persons who participated in, or assisted Defendant in, the negotiation of the Settlement Agreement of August 2003 or the Settlement Agreement of March 2005 between Plaintiff and Defendant.

**INTERROGATORY NO. 10**

For each of the following designations, in connection with the production of prosciutto, describe Defendant's production process and the minimum time the product is aged: GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA.

**INTERROGATORY NO. 11**

Provide the quantity of prosciutto products sold by Defendant, by year since January 1, 2000, under each of the following designations, broken out by product sold in bulk and product sold in packages of pre-sliced prosciutto: DANIELE, GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA.

**INTERROGATORY NO. 12**

Identify and fully describe all the ways in which Defendant claims that it has used or promoted each of the following as trademarks, and identify all facts and documents that Defendant contends support such usage or promotion: GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA.

**INTERROGATORY NO. 13**

Provide total expenditures, by year from 2000 to the present, which Defendant claims it has made or which Defendant claims have been made on its behalf to promote each of the following trademarks: GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA.

**INTERROGATORY NO. 14**

For each label used by Defendant since March 31, 2005 for the sale of prosciutto or prosciutto products, identify each person who has designed, produced or printed the label, including any firm retained by Defendant for such purpose.

**INTERROGATORY NO. 15**

Identify all persons whom Defendant intends to call as witnesses in this proceeding, and in each case indicate whether the person is a fact witness or expert witness.

**INTERROGATORY NO. 16**

For each prosciutto product sold by Defendant since March 31, 2005, give the amount of time, from the date of production, within which Defendant advised purchasers that the product should be sold or consumed.

**INTERROGATORY NO. 17**

Identify all persons who have given you, your attorney or any person, firm or corporation acting in your behalf, statements, voice recordings, reports or memoranda in any way concerning the claims and defenses alleged in the Complaint and Answer, the date of each such statement, voice recordings, reports or memoranda and identify the person who now has possession of same.

**INTERROGATORY NO. 18**

State the date on which Defendant decided to use each of the following as a trademark for prosciutto, and identify all facts and documents that support this claim: GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA.

**INTERROGATORY NO. 19**

Identify all persons who assisted or with whom Defendant consulted concerning the design or content of Defendant's current product brochure.

**INTERROGATORY NO. 20**

Identify all persons who have been responsible for Defendant's compliance with the Settlement Agreement of March 2005 between Plaintiff and Defendant, and describe the responsibilities of each in this regard.

**INTERROGATORY NO. 21**

Identify and describe all steps Defendant has taken to implement and comply with the Settlement Agreement of March 2005 between Plaintiff and Defendant, and all documents relating to such steps, including but not limited to internal communications such as orders or instructions relating to compliance with the Settlement Agreement.

**INTERROGATORY NO. 22**

Identify all instances since January 1, 2000 in which Defendant has been asked whether it is or was affiliated with, located in, or otherwise connected with San Daniele, the Consorzio del Prosciutto di San Daniele, or any member of the Consorzio since the signing of the Settlement Agreement between Plaintiff and Defendant.

**INTERROGATORY NO. 23**

Identify all changes to Defendant's Web site since January 1, 2003, with the date each change was made to the Web site.

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Dated: May , 2007

**CERTIFICATE OF SERVICE**

I hereby certify that on this 2nd day of May, 2007, I caused to be served via hand delivery a copy of the foregoing Plaintiff's First Set of Interrogatories Propounded to Defendant to Girard R. Visconti, Esq., Visconti and Boren, Ltd., 55 Dorrance Street, Providence, RI 02903.

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